

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. CROIX

CONSTANCE ALEXANDER and  
PETULA ALEXANDER and DINORAH  
WILLIAMS,

Plaintiffs,

v.

STEADFAST INSURANCE COMPANY  
(STEADFAST), CLARENDON  
AMERICAN INSURANCE COMPANY  
(CLARENDON), DEEP SOUTH  
SURPLUS OF TEXAS, L.P., and CRC  
SCU f/k/a CRUMP INS. SERVICES,

Defendants.

1:20-CV-38

**ACTION FOR DAMAGES**

JURY TRIAL DEMANDED

**NOTICE OF SERVICE OF PLAINTIFF CONSTANCE ALEXANDER FIRST  
DEMAND FOR PRODUCTION TO DEFENDANT STEADFAST INSURANCE  
COMPANY**

**PLEASE TAKE NOTICE** that Plaintiff **CONSTANCE ALEXANDER** has propounded her First Demand for Production of Documents to Defendant **STEADFAST INSURANCE COMPANY** through respective counsel of record, and that said documents were served upon the Defendant in the original.

RESPECTFULLY SUBMITTED  
LEE J. ROHN AND ASSOCIATES, LLC  
Attorneys for Plaintiffs

DATED: August 18, 2023

BY: /s/ Jennifer S. Koockogey-Lajoie  
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ALEXANDER, CONSTANCE, ET. AL. V. STEADFAST INSURANCE COMPANY, ET. AL.  
CASE NO. 1:20-CV-38, PETULA ALEXANDER'S FIRST REQUEST FOR PRODCUTION TO DEFENDANT STEADFAST  
INSURANCE  
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**CERTIFICATE OF SERVICE**

**THIS IS TO CERTIFY** that on August 18, 2023, I electronically filed the foregoing with the Clerk of the Court using the electronic filing system, which will send a notification of such filing to the following:

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Attorney for Steadfast

BY: /s/ Jennifer S. Koockogey-Lajoie (al)